

## **EXHIBIT C**

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8 Attorney for Plaintiff, JOSHUA ASSIFF

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11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

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14 **JOSHUA ASSIFF,**

15 **Plaintiff,**

16 **v.**

17 **COUNTY OF LOS ANGELES;  
SHERIFF DEPUTY BADGE  
NUMBER 404532;  
And DOES 1 through 10,**

18 **Defendants.**

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20 **Case No. 2:22-cv-05367 RGK (MAAx)**

21 **PLAINTIFF'S INITIAL  
DISCLOSURES – DAMAGES  
FRCP 26(a)(1)(iii)**

22 Plaintiff JOSHUA ASSIFF (hereinafter referred to as "Plaintiff") hereby  
23 submits the following initial disclosures – documents – under Federal Rules of  
24 Civil Procedure, Rule 26(a)(1)(iii):

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26 **1. Compensatory Damages:**

27 A. Physical harm to plaintiff during and after the events at issue,  
28 including ill health, physical pain, disability, disfigurement, or discomfort, and any  
such physical harm that plaintiff is reasonably certain to experience in the future.  
\$2,000,000.00

1           B.     Emotional and mental harm to plaintiff during and after the events at  
2 issue, including fear, humiliation, and mental anguish, and any such emotional and  
3 mental harm that plaintiff is reasonably certain to experience in the future.

4           \$2,000,000.00

5           C.     The reasonable value of the medical, psychological, hospital, nursing,  
6 and similar care and supplies that plaintiff reasonably needed and actually obtained,  
7 and the present value of such care and supplies that plaintiff is reasonably certain to  
8 need in the future. \$100,000.00

9           D.     The wages, salary, profits, reasonable value of the working time that  
10 plaintiff has lost because of his inability or diminished ability to work, and the  
11 present value of the wages, etc. that plaintiff is reasonably certain to lose in the  
12 future because of his inability or diminished ability to work. \$0

13           E.     The reasonable value of property damaged or destroyed. \$0

14           F.     The reasonable value of legal services that plaintiff reasonably needed  
15 and actually obtained to defend and clear himself. \$10,000.

16           G.     The reasonable value of improper confinement. \$10,000.

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18           **2. Nominal Damages**

19           Even if plaintiff fails to prove compensatory damages, plaintiff is entitled to  
20 at least nominal damages of \$1.00 as a result of defendant's violation of plaintiff's  
21 federal rights.

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23           **3. Punitive Damages**

24           Defendant acted maliciously and wantonly in violated plaintiff's federally  
25 protected rights. Consequently, plaintiff is entitled to punitive damages in an  
26 amount to deter defendant, and other like defendant, from committing such conduct  
27 in the future. The amount of punitive damages shall be proven at trial but should be  
28 no less than \$2,000,000.00

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2 **4. Attorney Fees**

3 Plaintiff was required to employ employee attorneys to bring this action to vindicate  
4 his rights. Plaintiff is entitled to a reasonable fee to compensate his attorneys. The  
5 amount of that fee will be determined at the conclusion of this action.

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8 DATED: October 26, 2022 The Law Office Of Thomas M. Ferlauto, APC

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By: 

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Thomas M. Ferlauto

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Attorney For: Plaintiff, JOSHUA ASSIFF

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